

Desk statement

EPA Response to Sierra Club Letter to the Office of Inspector General

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The U.S. Environmental Protection Agency (EPA) has responded to a letter from Sierra Club dated March 14, 2017, to the Office of Inspector General. In its letter, Sierra Club requested an inquiry into public statements regarding climate change made by Administrator Pruitt and said that his statements violated the EPA Scientific Integrity Policy. The EPA response stated that the Administrator did not violate the Policy.

Technical POC: Kevin Teichman, Ph.D., Scientific Integrity Program

Interviewee:

Communications POC: Carolyn Hubbard, ORD Communications Director

Background:

EPA's Scientific Integrity Policy, which was issued in February 2012, provides a framework to ensure scientific integrity throughout EPA and to promote scientific and ethical standards, communications with the public, the use of peer review and advisory committees, and professional development.

The Scientific Integrity Policy applies to all EPA employees, contractors, grantees, collaborators and student volunteers, including political appointees. The Scientific Integrity Policy explicitly protects differing opinions, stating that:

When an Agency employee substantively engaged in the science informing an Agency policy decision disagrees with the scientific data, scientific interpretations, or scientific conclusions that will be relied upon for said Agency decision, the employee is encouraged to express that opinion...¹

The freedom to express one's opinion on the science is fundamental to EPA's Scientific Integrity Policy even (and especially) when that point of view might be controversial. This protection is afforded to any employee "substantively engaged in the science," including the Administrator when he speaks on matters of science "informing an Agency policy decision." The protection is forward-looking and is designed to encourage the employee to express his or her opinion if he or she "disagrees with the scientific data, scientific interpretations, or scientific conclusions that will be relied upon for said Agency decision."

¹ EPA's Scientific Integrity Policy: https://www.epa.gov/sites/production/files/2014-02/documents/scientific_integrity_policy_2012.pdf

In his response, the Administrator expressed his opinion regarding contributors to global warming and called for more debate, review and analysis as a precursor to any future EPA policy decision on the matter. This expression of opinion, which was not made in a decisional context, is fully within the protections of EPA's Scientific Integrity Policy and does not violate that Policy. We also note that the Administrator, in his televised remarks, did not suppress or alter Agency scientific findings.

Questions and Answers:

- 1. Who conducted the evaluation of this allegation of a violation of the Scientific Integrity Policy?**
- 2. What criteria did EPA use to evaluate this allegation of a loss of scientific integrity?**
- 3. Why didn't Francesca Grifo, EPA's Scientific Integrity Official, respond to the letter?**
- 4. Why is scientific integrity important?**

Scientific integrity ensures objectivity, clarity, reproducibility, and utility. It provides insulation from bias, fabrication, falsification, plagiarism, outside interference, and censorship. The science at the Environmental Protection Agency is robust and ready to meet the task of guiding our work to protect human health and the environment. From the earliest formation of a scientific question to the application of those research results, scientific integrity creates protections for science from inappropriate interference, manipulation or suppression. This assures that EPA decisions are based on the best science the Agency, its contractors, grantees, and collaborators have to offer.

- 5. What can you tell me about a specific active allegation of a loss of scientific integrity?**

We treat allegations of a loss of scientific integrity confidentially. We do not provide any information about active allegations. Once our assessment is complete, we provide summary information to the interested parties.

- 6. Has the new administration tried to influence or diminish the EPA Scientific Integrity work?**

No. We continue to promote the value of scientific integrity across EPA and to conduct our work, as best we can, given our available staff and resources.

- 7. Will policy decisions at EPA continue to be based on sound science?**